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March 11, 2021

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street, Rm 1050
New York, NY 10007

Re: United States v. Jose Rodriguez
1:19cr779 (AKH)

Dear Judge Hellerstein:

The undersigned, together with Louis Freeman, are appointed counsel for Mr. Jose Rodriguez. Mr. Rodriguez is currently scheduled to be sentenced before the Court on March 24, 2021. Mr. Freeman and I respectfully request that the court continue the sentencing for sixty (60) days for the following reasons.

As a result of the length of the sentence that Mr. Rodriguez faces and the mitigation he hopes to present to the Court, Mr. Rodriguez wishes to be present in-court at the time of sentencing accompanied by his lawyers. Although I do not know Mr. Freeman's particular situation, I am scheduled to receive my first anti-COVID vaccine on April 1, 2021 with the second vaccine to be administered 30 days later. Although I will attend the sentencing in person, I do not think it is prudent to do so until I have received both doses.

Additionally, the defendant, at sentencing will argue on several grounds, why his guideline calculations suggest a sentence "greater than necessary." In order to adequately prepare for those arguments, counsel for Mr. Rodriguez are gathering materials which we will refer to at sentencing. We need additional time to gather said material.

I have spoken with AUSA Andrew Chan who indicates that the government has no objection to this request. As such, the defendant respectfully requests that Mr. Rodriguez's sentence be continued for sixty days.

*The sentencing is adjourned
until June 7, 2021 at 11:00 am*
X [Signature] 3-12-2021

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Respectfully submitted

___/s/ *Bruce D. Koffsky* ___
Bruce D. Koffsky

BDK/me
Encl.

cc: All Counsel of Record